

**Exhibit B****Declaration of Warren V. Norred**

My name is Warren Norred, my date of birth is February 21, 1963, and my business address is 515 E. Border Street, Arlington, Texas, US. I declare under penalty of perjury that the facts stated below are true and correct.

1. I am an attorney and owner of Norred Law, PLLC and licensed to practice law in Texas.
2. I have been practicing law in the DFW area for over a decade and I am familiar with reasonable pricing for legal services in the State of Texas.
3. I have previously testified regarding reasonable attorneys' fees in Texas, in multiple courts, and I have litigated in every federal court in Texas and every attached bankruptcy court.
4. I have also litigated in federal courts in California and Kansas, and in the Fifth and Ninth and Federal Courts of Appeal.
5. I have tried to verdict more than a dozen trials, the longest of which lasted ten (10) days, including jury deliberations. My most complex single federal case was a two-day patent case.
6. Beyond jury trials, I have completed several dozen cases to judgment involving fees.
7. I was retained by Black 13 Enterprises, Inc. to represent it in case no. 1:21-cv-10877 against TFL Franchise Systems, LLC.
8. As part of my representation, I have filed all documents and proceedings in the above case.
9. I am the custodian of the business records concerning attorney fees concerning this case on behalf of Black 13 Enterprises, Inc., plaintiff in the present case.
10. As of the date of this signing, my team and I spent more than 120 hours on this case pursuing claims against defendant TFL Franchise Systems, LLC for a subtotal billable amount of \$36,569.50, as reflected on the task/time report attached in support of these fees.
11. In addition to these records, I will spend at least six more hours on this matter, which includes 1.5 hours for a reply in support, 1.5 hours for travel to and from the courthouse, 1.5 hours to prepare for the hearing, and 1.5 hours waiting for and participation in the hearing, for an estimated time for a hearing on this MSJ at \$2600 more, and a total of **\$39,169.50** in reasonable and necessary fees and expenses in this matter.
12. If this matter was appealed, I estimate that the appeal would be reasonably simple, and based on the several matters that I have appealed in the past, the briefing to the Court of Appeals would cost no less than six hours to file the appellee's brief and another four hours, or \$4500 total if the case is unsuccessfully appealed.
13. Attached as Exhibit B-1 is a list of tasks accomplished in my firm's representation of Black 13 Enterprises, Inc., taken from Mycase, which my firm uses for case management, These billing records are kept by me in the regular course of business, of which I have personal knowledge, and it was the regular course of my business to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. These records are directly from my electronic database.

In reaching my opinions, I have reviewed the factors set forth in *Arthur Anderson v. Perry Equip. Corp.*, 945 S.W.2d 812, 819 (Tex. 1997). The following factors have guided me in determining the reasonableness of the amount of fees to be awarded to Plaintiff:

**a. the time and labor required, the novelty and difficulty of the questions involved, and the skill required to perform the legal service properly.**

This case should have been a contract dispute, but then was aggravated by Defendants' overt fraud, and now made more difficult by MA law, a state which does not regulate locksmiths.

**b. the likelihood that the acceptance of the particular employment will preclude other employment by the lawyer.**

The time devoted to this case was appropriate, as demonstrated in attached exhibit showing the time devoted to this matter, the Norred Law attorneys who worked on this matter were foreclosed from working on additional matters during those time periods.

**c. the fee customarily charged in the locality for similar legal services.**

I am familiar with fees charged for similar work. I believe the fees identified here are reasonable and customary, ranging up to \$450 in the last year.

**d. the amount involved and the results obtained.**

The potential amount involved is expected to be a reasonable breach of contract and fraud award, which supports the award of fees.

**e. the time limitations imposed by the client or by the circumstances.**

This factor also weighs in favor of the reasonableness of the fee amount, particularly when the delays caused by legislative continuances.

**f. the nature and length of the professional relationship with the client.**

Norred Law, PLLC has represented Tobin M. Gilman, representative for Black 13 Enterprises, Inc. in several cases ranging as far back as 2019.

**g. the experience, reputation, and ability of the lawyers performing the services.**

These matters have been addressed previously above. Clients come to Norred Law when faced with difficult cases that involve unique fact patterns, as this case did. Warren Norred has been known for significant cases in which an inadequately defended litigant needed assistance against a party with substantially more resources, e.g., Shelley Luther, Open Carry, and currently, Berkey v. the EPA.

**h. whether the fee is fixed or contingent on results obtained or uncertainty of collection before the legal services have been rendered.**

Norred Law is billing our client based on hourly rates for this matter.

Executed in Tarrant County, State of Texas on August 16, 2024,

  
Warren V. Norred

**EXHIBIT B-1**

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Rate</b>	<b>Time</b>	<b>Total</b>	<b>Description</b>
04/19/2021	MA	Fees	\$5,000.00	1.00	\$5,000.00	Retainer fee to Schlossberg LLC for local counsel
04/21/2021	MA	Mailing	\$120.00	0.10	\$12.00	Mailed check #5820 to MA local counsel for retainer.
04/27/2021	MA	Email	\$120.00	0.10	\$12.00	Check rec'd, emailed draft of complaint to T Stichel
04/30/2021	TH	Draft Document	\$200.00	1.50	\$300.00	MSJ: Pulled elements for Brach, Fraud and exemplary damages. Compiled relevant exhibits.
05/24/2021	TH	Email	\$200.00	0.10	\$20.00	Emailed local counsel requesting update.
05/24/2021	TH	Hourly Case Work	\$200.00	0.50	\$100.00	Reviewed MA counsel suggested edits. Sent revisions plus exhibits.
05/27/2021	TH	Hourly Case Work	\$200.00	0.10	\$20.00	Brief WN re: Stichel changes.
06/04/2021	WVN	Hourly Case Work	\$425.00	0.25	\$106.25	Email exchange on waiver of service. Set up file with contacts.
06/25/2021	MA	Hourly Case Work	\$120.00	1.00	\$120.00	Draft and correspond w/ local counsel re. Admission PHV for WVN.
08/25/2021	JD	Research	\$200.00	1.00	\$200.00	Reviewed and performed research for 12(b)(6) motion to dismiss
08/26/2021	JD	Draft Document	\$200.00	4.00	\$800.00	Drafted response to 12(b)(6) Motion to Dismiss
08/30/2021	MA	Hourly Case Work	\$120.00	1.00	\$120.00	Edit Resp 12b6 for grammar, formatting, clarity. Build table of contents and table of authorities
08/30/2021	JD	Draft Document	\$200.00	1.00	\$200.00	Cont'd drafting and finalized 12(b)(6) resp for review
08/30/2021	WVN	Draft Document	\$425.00	1.00	\$425.00	Finalized 12b6 response.
09/13/2021	TH	Email	\$200.00	0.10	\$20.00	Status Update to clients
09/13/2021	TH	Email	\$200.00	0.10	\$20.00	Response to client re: Motion to dismiss response question.
09/17/2021	TH	Discovery	\$200.00	2.00	\$400.00	First Draft of Discovery Requests to TFL
09/24/2021	TH	Discovery	\$200.00	1.30	\$260.00	Additional work fleshing out ROGs. Passed to KF for check.
09/27/2021	TH	Case Status Check	\$200.00	0.10	\$20.00	Discovery drafted, SB to review. Discovery conference on October 12, by phone. WN to attend with local counsel.
10/06/2021	TH	Email	\$200.00	0.10	\$20.00	Emailed discovery to clients for review.
10/06/2021	TH	Email	\$200.00	0.10	\$20.00	Answered client's email. Clarified that there has been no order on 12b6 yet.
10/06/2021	TH	Email	\$200.00	0.10	\$20.00	Response to client's procedural inquiry.
10/07/2021	TH	Email	\$200.00	0.10	\$20.00	Replied to question from client re: discovery.

Date	User	Activity	Rate	Time	Total	Description
10/07/2021	TH	Review Document	\$200.00	0.20	\$40.00	Reviewed Proposed Scheduling Order. WN needs to sign off so we can file before 11:00 cst on 10/08
10/22/2021	TH	Case Status Check	\$200.00	0.20	\$40.00	Client has sent back comments re discovery. TH assigned to revise discovery weak of 10/25
10/29/2021	TH	Discovery	\$200.00	1.50	\$300.00	New draft of discovery incorporating Gillman's comments
11/10/2021	TH	Case Status Check	\$200.00	0.20	\$40.00	No action from court on 12b6.
11/15/2021	TH	Case Status Check	\$200.00	0.10	\$20.00	Noticed WN to review discovery requests to TFL.
02/28/2022	TH	Case Status Check	\$200.00	0.10	\$20.00	Still waiting for ruling from court on 12b6.
04/20/2022	TH	Draft Document	\$200.00	1.00	\$200.00	First draft of initial disclosures. Need more info from clients re potential witnesses.
04/20/2022	TH	Email	\$200.00	0.20	\$40.00	Created witness list based on prior knowledge and docs in file. Emailed clients seeking clarification.
04/27/2022	TH	Hourly Case Work	\$200.00	0.20	\$40.00	Reviewed witness info from client received on 4/27. Incorporated info into initial disclosures.
05/04/2022	QR	Review Document	\$75.00	1.00	\$75.00	Review discovery requests and amend to reflect WN comments.
06/13/2022	TH	Case Status Check	\$200.00	0.20	\$40.00	Still waiting court. Discovery closes in 3 weeks. Briefed EG. Discovery will be ready, but may need motion to extend time. TH to confer with WN.
06/21/2022	TH	Case Status Check	\$200.00	0.20	\$40.00	Allied counsel recommends against filing motion in court. MA has called and court has stated that 12b6 motion is on the review list. Court has stayed all deadlines while it ponders.
07/18/2022	TH	Case Status Check	\$200.00	0.10	\$20.00	Still no word from the court.
08/11/2022	TH	Case Status Check	\$200.00	0.20	\$40.00	No word from court.
09/06/2022	TH	Case Status Check	\$200.00	0.10	\$20.00	Checked for any update, but MA federal court has still not ruled on 12b6.
10/17/2022	TH	Case Status Check	\$200.00	0.10	\$20.00	Still no ruling from MA court.
12/06/2022	TH	Case Status Check	\$200.00	0.10	\$20.00	Still waiting on court to rule on 12b6
02/23/2023	TH	Case Status Check	\$200.00	0.20	\$40.00	Reviewed MA docket. Still no word from Court. TH to confer with WN next week.
03/02/2023	TH	Conference	\$200.00	0.10	\$20.00	Updated WN. WN to speak with the client.
03/02/2023	WVN	Phone Call	\$450.00	0.30	\$135.00	Spoke with client
07/13/2023	TH	Email	\$200.00	0.10	\$20.00	Emailed client concerning Motion Hearing set for 8/16/2023 12:30 PM in Courtroom 22 (In person only) before Judge George A. O'Toole Jr.

Date	User	Activity	Rate	Time	Total	Description
07/18/2023	TH	Hourly Case Work	\$200.00	0.20	\$40.00	Spoke with WN re: allied counsel has a conflict with motion hearing. She may sub in another member of her firm.
08/16/2023	MA	Hourly Case Work	\$120.00	0.10	\$12.00	Rec'd and saved notice of motion hearing, updated client: court heard mots dismiss, has taken them under advisement.
08/25/2023	TH	Case Status Check	\$200.00	0.10	\$20.00	Need to pay allied counsel invoice.
09/12/2023	TH	Case Status Check	\$200.00	0.50	\$100.00	Reviewed file and court docket. TH to speak with WN re: discovery. 12b6 is still under advisement by the judge.
09/14/2023	MA	Hourly Case Work	\$120.00	0.10	\$12.00	Rec'd and saved order denying Mot Dismiss, emailed to client.
09/14/2023	TH	Case Status Check	\$200.00	0.10	\$20.00	TFL's motion to dismiss is denied. MA setting up scheduling a conference. WN to review discovery.
09/15/2023	MA	Hourly Case Work	\$120.00	0.30	\$36.00	Calculate and calendar new disclosures deadline (10/16) email to local counsel about how to interpret scheduling order in light of order granting extensions of deadlines.
09/15/2023	TH	Hourly Case Work	\$200.00	0.10	\$20.00	Caught up on correspondence between MA and TS.
09/21/2023	TH	Draft Document	\$200.00	3.75	\$750.00	Drafting MSJ facts and causes of action.
09/22/2023	MA	Hourly Case Work	\$120.00	0.30	\$36.00	Emailed court to ask about a new scheduling conference/order. Emailed client to scheduled time d=to discuss disclosures.
09/26/2023	TH	Review Document	\$200.00	0.85	\$170.00	Reviewed file on J-Hanging suit for evidence, and preparation for client meeting tomorrow.
09/27/2023	KF	Hourly Case Work	\$90.00	1.00	\$90.00	Sanity check of MSJ
09/27/2023	TH	Meeting	\$200.00	1.00	\$200.00	WN and TH met with the clients. Discussed an individual from ihatefranchises.com who may have useful evidence. Damage number calculations, initial disclosures, strategy.
09/27/2023	WVN	Meeting	\$450.00	0.90	\$405.00	Met with client to discuss disclosures and potential settlement
10/01/2023	WVN	Review Document	\$450.00	0.30	\$135.00	Rec'd TFL's answer. Sent email inquiry regarding settlement.
10/02/2023	WVN	Hourly Case Work	\$450.00	0.10	\$45.00	Docket meeting: WVN met with client, need to offer settlement now that we have survived dismissal.
10/04/2023	TH	Review Document	\$200.00	0.10	\$20.00	Reviewed prop scheduling order and briefed WN.
10/04/2023	WVN	Hourly Case Work	\$450.00	0.25	\$112.50	Evaluate proposed sched order and send back to OC
10/06/2023	TH	Hourly Case Work	\$200.00	0.10	\$20.00	Confirmed with WN and MA that OC filed the status report due today.

Date	User	Activity	Rate	Time	Total	Description
10/09/2023	WVN	Hourly Case Work	\$450.00	0.10	\$45.00	Docket meeting: MA to advise local counsel that they are not required to attend zoom hearing.
10/10/2023	TH	Case Status Check	\$200.00	0.20	\$40.00	WN to attend zoom hearing. MA to make sure allied counsel knows they are off the hood for the zoom hearing.
10/11/2023	WVN	Hearing, Attend.	\$450.00	0.40	\$180.00	Attend status conference. Judge made a few changes to discovery and asked about the state case.
10/17/2023	MA	Hourly Case Work	\$120.00	0.70	\$84.00	Rec'd and saved scheduling order. Calendared deadlines.
10/17/2023	TH	Case Status Check	\$200.00	0.20	\$40.00	Confirmed Initial disclosures have been served on OC.
10/23/2023	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN and GH. GH editing discovery requests.
10/23/2023	GH	Draft Discovery	\$60.00	1.50	\$90.00	Drafting work in Plaintiff's first set of discovery requests to Defendant.
10/23/2023	WVN	Hourly Case Work	\$450.00	0.10	\$45.00	Docket meeting: WVN to review MSJ, need to make payment to local MA counsel.
11/14/2023	TH	Review Document	\$200.00	0.20	\$40.00	Checked Disclosures. Spoke with WN. WN to serve today.
11/15/2023	TH	Review Document	\$200.00	0.10	\$20.00	Reviewed Initial disclosures received from TFL.
11/15/2023	TH	Email	\$200.00	0.10	\$20.00	Emailed TFL's initial disclosures to clients.
11/21/2023	AN	Attorney Fees	\$86.00	1.00	\$86.00	Local council-Schlossberg, LLC invoice #25723
11/21/2023	WVN	Discovery	\$450.00	1.25	\$562.50	Revised, finalized, and served discovery to OC. Copied clients.
11/22/2023	TH	Meeting	\$200.00	0.10	\$20.00	Discussed damages matter with WN.
12/29/2023	MA	Hourly Case Work	\$120.00	0.50	\$60.00	OC sent disc reqs to WVN on 12/19, saved to case file, calculated and calendared response deadline (1/18), sent to client with info on responses.
01/03/2024	WVN	Status Check	\$450.00	0.10	\$45.00	Docket meeting: TFL responded to our disc reqs, WVN to evaluate.
01/11/2024	WVN	Review Document	\$450.00	0.50	\$225.00	Review TFL's disc responses, audit discovery correspondence w/ OC to confirm no docs have been produced, made notes on insufficiencies and emailed OC.
01/26/2024	WVN	Hourly Case Work	\$450.00	0.25	\$112.50	Amend protective order and send back to CC.
01/29/2024	GH	Draft Discovery	\$60.00	1.00	\$60.00	Draft Plaintiff's response to Defendants first set of Interrogatories.
01/29/2024	GH	Draft Discovery	\$60.00	0.75	\$45.00	Draft Plaintiff's response to Defendants request for production.
02/12/2024	GH	Document Preparation	\$90.00	1.50	\$135.00	Work on prep and organization of responsive documents to Def's RFP.

Date	User	Activity	Rate	Time	Total	Description
02/12/2024	GH	Hourly Case Work	\$90.00	2.00	\$180.00	Finished final prep and organization of responsive documents. Formatted, combined and bates stamped them. Inserted responsive documents bates number range into the RFP response draft. Created cover sheet for Dropbox link and uploaded the documents.
02/12/2024	GH	Document Redaction	\$90.00	0.30	\$27.00	Begin redaction of sensitive info in RFP responsive documents.
02/13/2024	GH	Document Redaction	\$90.00	1.50	\$135.00	Finish redacting the sensitive info in RFP responsive documents.
02/13/2024	GH	Draft Discovery	\$90.00	0.75	\$67.50	Draft response to Def's requests for interrogatories.
02/14/2024	WVN	Review Document	\$450.00	0.40	\$180.00	Spoke to GH. Review our responses to Def's requests for interrogatories.
02/15/2024	GH	Draft Discovery	\$90.00	1.00	\$90.00	Work on Interrogatory responses. Call with TG. Found and added additional documents to our RFP responses. Bates stamp and organize new documents. Updated RFP response bates range.
02/15/2024	GH	Email	\$90.00	0.30	\$27.00	Spoke to WN. Sent TG our responses to Def's requests for production and interrogatories. TG to sign interrogatories and send back.
02/15/2024	GH	Draft Discovery	\$90.00	0.30	\$27.00	Phone call with TG. Made corrections to interrogatories after receiving feedback from TG. Sent to TG.
02/15/2024	WVN	Review Document	\$450.00	0.20	\$90.00	Review responses to Def's requests for production and interrogatories. Ready to send.
02/16/2024	MA	Hourly Case Work	\$120.00	0.10	\$12.00	Served client's responses to discovery on OC via email.
02/29/2024	TH	Case Status Check	\$200.00	0.10	\$20.00	Looks like need further review of TFL's discovery. Also need to work on damage numbers. TH to confer with WN.
03/04/2024	TH	Docket	\$200.00	0.20	\$40.00	TH spoke with WN. WN to speak with client re: clear articulation of damages. Need to evaluate the most recent discovery responses and possibly seek a motion to compel.
03/04/2024	WVN	Status Check	\$450.00	0.10	\$45.00	Docket with staff
03/08/2024	TH	Discovery	\$200.00	2.00	\$400.00	Review of supplemental discovery response documents. AC is making a list of all Bates-labeled blank documents for a discovery deficiency letter. ROIs also contain frivolous objections. TH to email an update to the client and discuss prospects for a deficiency letter with WN.
03/08/2024	TH	Email	\$200.00	0.10	\$20.00	Emailed clients with an update on responsive documents from TFL and solicited input.
03/11/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	Need discovery defect letter to OC and potentially Motion to compel. KF and MA to draft.
03/13/2024	MA	Email	\$120.00	0.30	\$36.00	Emails w/ client and OC re. deposition dates.



Date	User	Activity	Rate	Time	Total	Description
03/13/2024	KF	Draft Document	\$90.00	0.25	\$22.50	Drafted fee declaration for WVN
03/14/2024	MA	Hourly Case Work	\$120.00	0.30	\$36.00	Emails w/ OC re. deposition. Rec'd and saved notice, sent to client.
03/14/2024	TH	Hourly Case Work	\$200.00	0.10	\$20.00	Reviewed depo notice to clients. Confirmed MA sent to clients.
03/18/2024	MA	Hourly Case Work	\$120.00	0.20	\$24.00	Emails re. deposition dates, rec'd and saved depo notice, sent to client.
03/18/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN. WN working on status report and preping for conference. TH to review new discovery sent over by OC.
03/18/2024	WVN	Phone Call	\$450.00	0.35	\$157.50	Status report with CC
03/18/2024	WVN	Status Check	\$450.00	1.25	\$562.50	Review communications on TG's depo over last week, TG's review of discovery. Work with CC on report for court on 3/18,
03/19/2024	TH	Review Document	\$200.00	1.80	\$360.00	Reviewed new 607 documents produced by TFL.
03/20/2024	MA	Hourly Case Work	\$120.00	0.10	\$12.00	Reset discovery deadline, email from OC re. deposition dates
03/20/2024	TH	Case Status Check	\$200.00	0.10	\$20.00	The Court reviewed the status of discovery with the parties and inquired as to their desire for a mediation hearing. The parties indicated that they are not interested at this time. The fact discovery deadline is extended to April 15, 2024. All other deadlines in the October 11, 2023 scheduling order remain in place.
03/20/2024	WVN	Hearing, Attend.	\$450.00	0.50	\$225.00	Status Conference w/Magistrate Judge Jennifer C. Boal: Status Conference held on 3/20/2024. The Court reviewed the status of discovery with the parties and inquired as to their desire for a mediation hearing. The parties indicated that they are not interested at this time. The fact discovery deadline is extended to April 15, 2024. All other deadlines in the October 11, 2023 scheduling order remain in place. (Attorneys present: Norred for the plaintiff. Callanan for the defendant.)
03/21/2024	MA	Hourly Case Work	\$120.00	0.50	\$60.00	Calendared scheduling order, discussed possible conflicts between depo dates in this case and trial in <a href="#">IFR</a> .
<a href="#">03/21/2024</a>	WVN	Hourly Case Work	\$450.00	0.40	\$180.00	Work on depositions, calendar status.
03/22/2024	GH	Draft Document	\$90.00	2.00	\$180.00	Spoke to MA re: Callanan's lack of response to Interrogatories. Draft Mot to Compel
03/26/2024	MA	Hourly Case Work	\$120.00	0.30	\$36.00	Finalize depo dates: Toby Gilman on April 19, Defs on 5/1 (SN to handle if WVN is in trial).
03/26/2024	MA	Email	\$120.00	0.10	\$12.00	Email to Deb Breen about possible testimony.



Date	User	Activity	Rate	Time	Total	Description
03/26/2024	GH	Draft Notice	\$90.00	0.60	\$54.00	Draft notice of intent to take oral deposition of Brett McMenimon, Barry McMenimon and Steve Quinn.
03/27/2024	MA	Hourly Case Work	\$120.00	0.70	\$84.00	Revise depo notices and serve. Send copies to Stryker for reporter coverage. Email w/ OC re. possible call re discovery and recording of Depositions.
03/27/2024	WVN	Email	\$450.00	0.30	\$135.00	Email correspondence with OC re: motion to compel interrogatories
03/28/2024	WVN	Status Check	\$450.00	1.25	\$562.50	Email threads on Rec'd new discovery from TFL, discussions on depo dates; need to call Deb Breen, who is not a TFL agent; also reviewed discovery issues, and sent another email thread on mot compel. CC and WN to discuss next week.
04/08/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN. WN emailed OC re: depositions. TH briefed WN on MSJ. WN to discuss damages with client.
04/12/2024	WVN	Phone Call	\$450.00	1.25	\$562.50	Call with OC, reviewing discovery. He's going to revisit with his client and get back to me. Reviewed our responses and sent email inquiry for more responses to RFI and RFP to clients.
04/15/2024	GH	Draft Discovery	\$90.00	1.50	\$135.00	Draft First Supplemental Responses to Defendants First set of Interrogatories, and RFP. Search for responsive documents.
04/15/2024	GH	Document Preparation	\$90.00	1.00	\$90.00	Organize, Prep, and Bates stamp responsive documents.
04/15/2024	GH	Phone Call	\$90.00	0.50	\$45.00	Additional drafting and review with WN re: current drafts.
04/15/2024	GH	Phone Call	\$90.00	0.50	\$45.00	Phone call w/ Toby Gilman re: responsive documents, and Interrogatory responses. Sent a copy of our drafts via email to Toby.
04/15/2024	WVN	Review Document	\$450.00	0.50	\$225.00	Review and editing in Interrogatories and RFP first supplemental responses.
04/16/2024	TH	Meeting	\$200.00	0.30	\$60.00	Discussion of Discovery status with GH.
04/16/2024	GH	Document Preparation	\$90.00	0.50	\$45.00	Organize, Prep, and Bates stamp additional responsive documents received today.
04/16/2024	GH	Draft Document	\$90.00	0.50	\$45.00	Final changes and review of First Supplemental Responses to Interrogatories and RFP. Ready to send to OC.
04/16/2024	WVN	Hourly Case Work	\$450.00	0.30	\$135.00	Approve discovery supplement work by GH.
04/17/2024	TH	Review Document	\$200.00	1.00	\$200.00	Caught up on doc review including the latest round that GH has compiled.
04/17/2024	GH	Draft Discovery	\$90.00	0.50	\$45.00	Additional documents were received overnight. Added to our Supplemental RFP responses. Prep, and Bates stamp the documents. Make edits to update bates number ranges.

Date	User	Activity	Rate	Time	Total	Description
04/17/2024	WVN	Email	\$450.00	0.30	\$135.00	Final review of First Supplemental Responses. Sent to Chris Callanan TFL's Counsel.
04/18/2024	WVN	Deposition	\$450.00	6.00	\$2,700.00	Depo of TG.
04/23/2024	MA	Hourly Case Work	\$120.00	0.40	\$48.00	Rec'd and saved TFL's motion for protective order re. informal records. Rec'd and saved Court's order on response (due 4/26) and hearing (in person, 4/29). Calendared deadline and hearing, notified WVN.
04/24/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	WN to respond to OC and sort out depo recording matter.
04/25/2024	MA	Hourly Case Work	\$120.00	0.75	\$90.00	Review and revise Response Mot Protective order for grammar/clarity/formatting.
04/25/2024	WVN	Draft Document	\$450.00	2.00	\$900.00	Draft response to Mot Protective Order
04/26/2024	TH	Review Document	\$200.00	0.20	\$40.00	Reviewed TFL's supplemental answer to Plaintiff's ROGs. Discussed with GH for motion to compel purposes.
04/29/2024	WVN	Docket	\$450.00	0.10	\$45.00	Docket meeting to discuss status of case
04/30/2024	TH	Discovery	\$200.00	2.50	\$500.00	Draft depo questions, email and phone call with TG. Discussion with WN.
04/30/2024	WVN	Hourly Case Work	\$450.00	2.00	\$900.00	Work on prep for depositions.
05/01/2024	TH	Meeting	\$200.00	0.10	\$20.00	Spoke with WN about expert designation due Friday. Pulled R26 requirements and added to WN's calendar for convenience.
05/01/2024	WVN	Deposition	\$450.00	7.00	\$3,150.00	Exhibit prep and depo of Brett, Barry, and Steve.
05/06/2024	WVN	Docket	\$450.00	0.10	\$45.00	Docket meeting with staff to discuss status report
05/07/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN. GH to review and make sure all recordings have been provided.
05/08/2024	WVN	Hourly Case Work	\$450.00	0.50	\$225.00	Status hearing attendance
05/13/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	Th spoke with WN. Need expert designation by May 31. Need to designate client as a financial expert. Need expert on Texas licensing of locksmiths regime. MA to draft status update.
05/13/2024	TH	Research	\$200.00	0.30	\$60.00	Researched Texas licensing experts. Found contact for Texas Locksmithing Association. TH to pass to WN.
05/13/2024	WVN	Hourly Case Work	\$450.00	0.20	\$90.00	Docket meeting: Need to update client, discuss possible expert on Texas locksmith regs.
05/15/2024	MA	Hourly Case Work	\$120.00	0.20	\$24.00	Rec'd and saved depo transcripts, Stryker invoices. Sent transcripts to client with update, sent invoices to AF for payment.
05/15/2024	MA	Deposition	\$528.00	1.00	\$528.00	Deposition of Steve Quinn, Stryker Invoice 9931A

Date	User	Activity	Rate	Time	Total	Description
05/15/2024	MA	Deposition	\$729.00	1.00	\$729.00	Deposition of Barry McMenimon, Stryker Invoice 9929A
05/15/2024	MA	Deposition	\$1,116.75	1.00	\$1,116.75	Deposition of Brett McMenimon, Stryker Invoice 9927A
05/17/2024	MA	Phone Call	\$120.00	0.20	\$24.00	Call w/Amanda, pres of TX Locksmith Assoc, re. expert testimony. She will discuss with board and call back.
05/17/2024	TH	Edit Document	\$200.00	0.20	\$40.00	Edited MSJ to include Summary Judgment Standard based on first circuit law.
05/17/2024	TH	Meeting	\$200.00	0.20	\$40.00	Discussion with AT claims.
05/17/2024	AT	Hourly Case Work	\$275.00	1.00	\$275.00	Work on Jury Charge
05/20/2024	TH	Case Status Check	\$200.00	0.30	\$60.00	TH spoke with WN. AT working on jury charge. MA working on retaining an expert on locksmithing regulation. WN tot talk to clients tonight about TG acting as expert on finance.
05/20/2024	WVN	Meeting	\$450.00	0.60	\$270.00	Meeting with T&M on strategy. Charged half time.
05/20/2024	AT	Meeting	\$275.00	0.10	\$27.50	Review Jury Charge with TH
05/20/2024	AT	Hourly Case Work	\$275.00	0.75	\$206.25	Work on Jury Charge
05/21/2024	AT	Hourly Case Work	\$275.00	0.55	\$151.25	Work on jury charge
05/21/2024	AT	Hourly Case Work	\$275.00	1.00	\$275.00	Work on Jury charge
05/22/2024	TH	Edit Document	\$200.00	0.40	\$80.00	Edits to jury charge.
05/23/2024	MA	Hourly Case Work	\$120.00	0.40	\$48.00	Emails and phone calls w/ ALOA members re. possible tex reg expert.
05/28/2024	MA	Hourly Case Work	\$120.00	0.20	\$24.00	Emails and phone calls to ALOA members re. possible expert witness.
05/28/2024	TH	Review Document	\$200.00	3.20	\$640.00	Reviewed Depos of Barry, Brett, and Steve. TH to discuss with WN re: depo and trial prep purposes.
05/30/2024	KF	Hourly Case Work	\$90.00	0.25	\$22.50	Called martin locksmith for licensed expert. MA sent relevant info to KM
05/30/2024	WVN	Hourly Case Work	\$450.00	0.10	\$45.00	Met with staff to discuss expert needed
05/31/2024	MA	Hourly Case Work	\$120.00	0.75	\$90.00	Draft expert designation, emails w/ client re. report and exhibits.
05/31/2024	TH	Phone Call	\$200.00	0.20	\$40.00	Discussion with MA and WN re: expert designations. MA to coordinate with TG re: report due today.
05/31/2024	TH	Review Document	\$200.00	0.10	\$20.00	Reviewed Gilman's recollections of conversation with Barry McMenimon regarding Dispute Between Gilman and Ewing
05/31/2024	TH	Review Document	\$200.00	0.40	\$80.00	Reviewed expert report and supporting spreadsheets.

Date	User	Activity	Rate	Time	Total	Description
05/31/2024	WVN	Drafting Document	\$450.00	1.25	\$562.50	Review and revise expert designations. Call with TG.
06/10/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with MA. WN and client still need to hash out damages for MSJ. TH needs to check on AT's work.
06/18/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH and WN spoke re: MSJ in light of recent depositions.
06/24/2024	MA	Hourly Case Work	\$120.00	0.40	\$48.00	Rec'd and saved depo notice for Gilman (as Expert). Both client and WVN have conflicts for date noticed. Emails w/ OC and client re. rescheduling.
06/24/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH, MA and WN discussed next steps. Need to revise MSJ. MA handling Gilman depo scheduling.
06/28/2024	TH	Case Status Check	\$200.00	0.10	\$20.00	Expert Depo of Gilman reset to July 15 at 9:00 by remote means.
07/01/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN. Depo of Gilman confirmed. WN to talk with client re MSJ, sort out damages. Also trial prep.
07/15/2024	WVN	Deposition	\$450.00	2.75	\$1,237.50	Prep for and depo for TG. Need to supplement with ADT subcontract, spreadsheets B & C, atty fee payment info, and the additional spreadsheets referenced on the final note to <a href="#">doc. 52</a> . MA to assist in doc gathering.
07/16/2024	MA	Hourly Case Work	\$120.00	0.20	\$24.00	Rec'd and saved additional docs for supplemental expert production. Inquired w/ reporter service re. cost of original client depo.
07/17/2024	MA	Hourly Case Work	\$120.00	0.60	\$72.00	Assemble and convert supplemental production to pdf and assemble, sent to client and WVN for final review.
07/17/2024	WVN	Hourly Case Work	\$450.00	0.40	\$180.00	Review and complete supp. discovery, approve for service.
07/22/2024	WVN	Status Check	\$450.00	0.10	\$45.00	Docket Meeting: Expert supplemental production served.
07/29/2024	TH	Review Document	\$200.00	0.20	\$40.00	Reviewed initial disclosures.
08/02/2024	MA	Email	\$120.00	0.20	\$24.00	Emails w/ client and OC re. continued expert depo.
08/09/2024	MA	Email	\$120.00	0.20	\$24.00	Additional emails re. scheduling continued expert depo.
08/12/2024	TH	Case Status Check	\$200.00	0.20	\$40.00	TH spoke with WN. Depo defense is scheduled for this week. Planning to file MSJ on file. GH to compile exhibits.
08/14/2024	TH	Meeting	\$200.00	0.10	\$20.00	TH spoke with MA re: impending dispositive motion deadline.
08/14/2024	WVN	Status Check	\$450.00	0.25	\$112.50	Review of case over phone with TB and CE. Need to chat about potential settlement and depo.
08/15/2024	TH	Edit Document	\$200.00	0.50	\$100.00	Edits to MSJ case law. KF to check fact citations.

<b>Date</b>	<b>User</b>	<b>Activity</b>	<b>Rate</b>	<b>Time</b>	<b>Total</b>	<b>Description</b>
08/15/2024	TH	Research	\$200.00	0.50	\$100.00	Research on punitive damages. Not clear how to access under MA law. TH to discuss with WN.
08/15/2024	TH	Meeting	\$200.00	0.20	\$40.00	Discussion of MSJ with MA and WN.
08/15/2024	TH	Email	\$200.00	0.10	\$20.00	Emailed Dec of TG seeking signature.
08/16/2024	GH	Hourly Case Work	\$90.00	2.00	\$180.00	Spoke to MA, TH, and WN re: status of MSJ. Edits to MSJ, prep and stamp exhibits. Draft fee declaration of WN.
			<b>TOTAL:</b>	<b>121.85</b>	<b>\$36,569.50</b>	

THE 193RD GENERAL COURT OF THE  
COMMONWEALTH OF MASSACHUSETTS

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SEARCH RESULTS FOR: "LOCK SMITH" OR  
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"lock smith" or locksmith

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Category	Result Detail	
Bill	H.3742	<div>An Act relative to locksmith licensing</div> <div>(c) "Regulatory Board" means the Board of <b>Locksmiths</b> ... The Board of <b>Locksmiths</b> shall consist of members appointed by the Director as follows: <b>locksmiths</b> and "citizen members ...</div>
Journal	10/3/2011	<div><a href="#">House Journal</a></div> <div>A communication from Plainridge Racecourse (under the provisions of Section 2 of Chapter ... Higgins and Michael J. Rodriques relative to the regulation and licensing of <b>locksmiths</b> ...</div>
Journal	10/11/2011	<div><a href="#">Senate Journal</a></div> <div>NOTICE: While reasonable efforts have been made to assure the accuracy of the data herein, this is NOT the official version of Senate Journal ... It is published to provide information ...</div>
Hearing	<div>Home Rule Petitions, Professional Licensure, Construction, Real Estate, Financial Disclosure, Solicitation Disclosure</div> <div>Wednesday, February 15, 2012, 11:00 AM • Wilmington Public High School</div>	